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03/21/2002 06:18:55 PM

Record Type: Record

To: Jennifer Wood Inforeg/OMB/EOP@EOP

cc:

Subject: comments regarding federal regulations

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HELLO!!

I AM VERY GLAD TO HAVE THIS E-MAIL OPPORTUNITY!!! I OWN A SMALL (4-5 EMPLOYEES) SAND DREDGING OPERATION (MINE) IN OKLAHOMA. MSHA (MINE SAFETY AND HEALTH ADMINISTRATION) HAS BEEN ATTACKING US FOR SEVERAL YEARS!! THE LAWS THEY USE (CFR 30) ARE AMBIGUOUS AND LEFT TO THE INSPECTOR'S OPINION!!! CITATIONS ARE GIVEN ON EVEN THE SMALLEST OF INFRACTIONS WITH FINES AND PENALTIES.

NO LONGER ARE WE, AS A MINE OR INDIVIDUALLY, ALLOWED TO ASK MSHA FOR HELP IN MAKING OUR FACILITIES SAFER!! WE ARE TOLD THEY WILL ONLY WRITE CITATIONS-NOT ACTUALLY MEET WITH US TO HELP MAKE THE MINE SAFER, ANSWER QUESTIONS, OR EVALUATE WITHOUT ISSUING TICKETS!

ANOTHER MAJOR PROBLEM IS MANY OF THE INSPECTORS ARE NOT QUALIFIED ENOUGH OR TRAINED ENOUGH TO IDENTIFY A TRULY UNSAFE SITUATION--INSTEAD KNIT-PICK THINGS OR MINOR INFRACTIONS ARE REGARDED AS LIFE THREATENING CAUSING CITATIONS, FINES, POINTS AND PENALTIES ARE BEING ISSUED AND ASSESSED. THIS IS COSTLY, BECAUSE FINES ARE BASED ON POINTS ISSUED!!

CFR 30 CERTAINLY NEEDS TO BE LOOKED AT AND REVISED TO ACTUALLY PROVIDE SAFER MINE LOCATIONS AND HELP TO THE MINES AND MINERS INSTEAD OF ACTING AS A POLICE AGENCY ONLY GIVING CITATIONS AND COLLECTING MONEY.

MY CURRENT SITUATION IS I HAVE HAD TO HIRE AN ATTORNEY TO REPRESENT MY SMALL COMPANY TO RESPOND TO THE MOST RECENT ATTACK ON MY MINE FROM AN INCOMPETANT MSHA INSPECTOR. I HAVE SPENT SEVERAL THOUSAND DOLLARS ON ATTORNEY FEES THAT ARE UNWARRANTED AND COMPLETELY UNNECESSARY BECAUSE OF THE TOTAL COMMUNICATION BREAKDOWN CONCERNING MSHA ADMINISTRATION AND POLICY.

PLEASE! PLEASE! REVIEW THIS AGENCY AND ITS POSITION ON ATTACKING SMALL OPERATIONS!!!

PLEASE LOOK AT THE QUALIFICATIONS FOR HIRING AND TRAINING OF THESE INSPECTORS, WHOSE PERSONAL OPINIONS, MOOD, AND BIAS DICTATE THE INTERPETATION OF THE REGULATIONS, THE ISSUING OF CITATIONS, INCLUDING THE DEGREE OF NEGLIGENCE AND LIKLIHOOD OF INJURY OR FATALITY.

I AM A FAMILY OWNED AND OPERATED FACILITY, WE WORK MONDAY THROUGH FRIDAY SO OUR EMPLOYEES CAN BE HOME EVENINGS AND WEEKENDS. MY COMPANY, AND MYSELF PERSONALLY ARE INTERESTED IN PROVIDING A SAFE AND EFFICIENT WORK PLACE FOR ALL WHO WORK HERE OR CUSTOMERS WHO PURCHASE OUR PRODUCTS. PLEASE LET US DEAL

WITH SPECIFIC RULES AND REGULATIONS WHICH CAN BE READ AND COMPLIED WITH INSTEAD OF THE GUESS WORK THAT IS INVOLVED IN THE CURRENT SET OF RULES AND REGULATIONS. PLEASE SEND QUALIFIED INSPECTORS WITH SOME MINE EXPERIENCE, PROPER TRAINING, AND AN UNDERSTANDING OF WHAT THE RULES AND REGULATIONS ARE --NOT WHOEVER SHOWS UP FOR THE JOB INTERVIEW, COMPLETED A FEW WEEKS OF CLASSROOM TRAINING AND SPENT A COUPLE OF WEEKS WITH IN THE FIELD WITH ANOTHER INSPECTOR.

PLEASE HELP!1

SINCERELY,

KELLY E. GODDARD  
PRESIDENT  
GODDARD CONCRETE CO. INC.  
SAND DIVISION



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